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March 13, 2017

Water Docket
Environmental Protection Agency
Mail Code 2822T
1200 Pennsylvania Ave. NW
Washington, DC 20460

(via *Regulations.gov*)

Docket ID No. EPA-HQ-OW-2016-0627
National Primary Drinking Water Regulations Six-Year Review

Dear US EPA:

The Kentucky Division of Water (the Division) appreciates the opportunity to comment on the six-year review of the National Primary Drinking Water Regulations. The Division has identified several areas and approaches in which the rules under review could be enhanced or modified to provide better protection of human health.

Total Organic Carbon (TOC)

When water systems transitioned into the Stage 2 Disinfectant By-Product (DPB) Rule, the required TOC percent removal ratio remained the same at 1.0. The use of TOC alternatives allow systems to remain in compliance for TOC removal, but data on state public water systems indicate, and inspection staff observe, that the alternative does not facilitate DBP compliance. In fact, the alternative has the potential to cause and/or allow systems to remain out of DBP compliance. The Division suggests that a greater TOC removal ratio (0.5) would help limit DBP formation, and the more stringent requirement would ultimately decrease the number of systems out of compliance for DBPs.

DBP Maximum Contaminant Level (MCL) requirements for Producers

Due to the infrastructure that connects producers with purchasers, water can travel through miles of line. Results from samples taken at the master meter between producing and purchasing systems show that even though the water producer may be in compliance for MCL, the same water on the purchasing side is non-compliant.

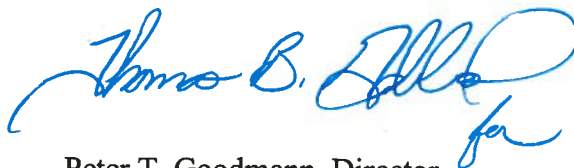
The Division suggests:

- 1/ Mandatory DBP sampling be taken at the master meter for both the producer and purchaser;
- 2/ Provide states with the ability to require sampling at the master meter; or
- 3/ When a purchasing system demonstrates the water it receives from the producer is non-compliant, allowing the state to require that the producer conduct a new IDSE and make changes to its sampling location.

Finally, collecting samples following a flush to eliminate a potential DBP violation cannot be considered a representative water sample, and undermines the rule's intent. The EPA should issue federal guidance for the development and implementation of flushing plans so that flushing schedules include adequate time following a flush to collect a representative water sample.

The Division appreciates the opportunity to comment on the proposed rule, and looks forward to continued work with the EPA.

Sincerely,

A handwritten signature in blue ink, appearing to read "Peter T. Goodman", with a stylized flourish at the end.

Peter T. Goodman, Director
Division of Water

PTG/cjc